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*Attorneys for Defendants*

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

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GLOBAL FREIGHT SYSTEMS CO. W.L.L.;  
GAMA CENTER; and GENOA PLASTIC  
INDUSTRIES,

Plaintiffs,

vs.

AL-MORRELL DEVELOPMENT, L.L.C. and  
PAUL A. MORRELL,

Defendants.

**DECLARATION OF PAUL A. MORRELL**

Case No. 1:14-cv-00133-TC  
Honorable Tena Campbell

Paul A. Morrell, being duly sworn, deposes and says as follows:

1. I am the managing member of Al-Morrell Development, LLC ("AMD"), I am competent to testify and I have personal knowledge of the statements made herein.
2. During the most recent Iraq war an entity by the name of Oasis International had a contract with the United States government to provide bottled water for the benefit of the United

States military during the Iraq war. AMD contracted with Oasis to build and operate water bottling facilities to manufacture the bottled water.

3. Beginning at least as early as April 2011 AMD requested transportation and warehousing services from Global Freight.

4. AMD continued to receive transportation and warehousing services from Global Freight throughout 2011.

5. In 2011 the United States military announced it would be withdrawing all forces from Iraq before the end of 2011. As a result, the United States government stopped ordering bottled water from Oasis.

6. In an effort to keep AMD operating, the option of selling bottled water in the Iraqi open market was explored.

7. In order to enter the open market in Iraq, and employ Iraqis, it was necessary to create an Iraqi entity that was at least partly owned by citizens of Iraq. In order to fulfill this requirement, an Iraqi entity by the name of Bright Pearl was created.

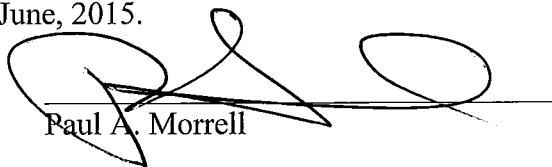
8. Not long after the formation of Bright Pearl, AMD was approached by several Iraqis who expressed an interest in purchasing AMD. Specifically the interested parties wanted to purchase the assets necessary to operate a bottled water manufacturing facility.

9. The Iraqis desiring to purchase AMD did not want to purchase a U.S. entity because of the complexities of managing a U.S. entity in Iraq. In order to accomplish the transaction AMD's assets were sold to Bright Pearl and the Iraqi purchasers acquired Bright Pearl. The asset purchase was finalized on January 3, 2012.

10. After January 3, 2012, any and all services rendered by Global Freight were rendered for the benefit of Bright Pearl, not AMD. Bright Pearl carried on the business of manufacturing bottled water and received services from Global Freight. AMD was no longer involved in the business of manufacturing bottled water after its assets were sold to Bright Pearl.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 26 day of June, 2015.



The image shows a handwritten signature in black ink. The signature consists of several loops and strokes that form the name "Paul A. Morrell". Below the signature, the name is written in a smaller, printed font: "Paul A. Morrell".

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of June, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/ R. Christian Hansen